

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE:

Andre Bisasor

Debtor,

Chapter 13

Case No.: 15-13369

US BANKRUPTCY COURT
2015 NOV 25 PM 3 57

MOTION TO EXTEND TIME


I hereby request an extension of time to provide updated schedules I and J as it relates to my request to waive appellate fees on the matters related to Greystar. This request is based on the following:

- 1) My attorney, David G. Baker has been hospitalized once again and will continue to be hospitalized this week. I have thus been unable to confer with him regarding matters related to the proper completion of my updated schedules.
- 2) I need more time to complete my transition and to determine the impact on my schedules. Without this additional time to complete my transition, the information provided in updated schedules I and J will likely be incomplete and inaccurate, which will be further compounded by the unavailability of my attorney.
- 3) Greystar and myself have been engaging in full settlement negotiations to settle this matter and to reach a global resolution of all issues. We are near reaching a settlement and need a little more time to finalize agreement. Therefore, I am asking for a 20 day extension of time until 12/17/15. This will potentially save on the resources of the court/the parties and redound to judicial economy, if the matter is settled and disposed of in a manner that spares the need for further litigation and appeals on this matter. If

settlement is reached then further appeals will become unnecessary and moot, therefore the issue of settlement is directly relevant as to whether a motion to waive appellate fees will be necessary since any notice of appeals will be withdrawn if settlement is reached. 20 days is a modest request under the circumstances and should be sufficient to finalize agreement and to sign-off on related settlement documentation, while also taking into account the intervening holidays.

WHEREFORE, I hereby humbly request this Honorable Court grant my request and or other relief that the Court deems just proper.

Respectfully Submitted,
The Debtor,

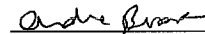


Andre Bisasor
3000 Presidents Way #3413
Dedham, MA 02026
781-492-5675

Dated: November 25, 2015

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on ~~Greystar~~ Greystar's attorney on November 25, 2015. GREYSTAR ATTORNEY IS Donna Ashton located at 28 Church St, Suite 110, Winchester, MA 01890.


Debtor Andre Bisasor
3000 Presidents Way #3413
Dedham MA 02026
781-492-5675

Dated: November 25, 2015